

*Exhibit A*

**AFFIDAVIT IN SUPPORT OF VERIFIED COMPLAINT FOR CIVIL FORFEITURE**  
**IN REM OF ONE 2008 LAND ROVER RANGE ROVER SPORT HSE BEARING**  
**VEHICLE IDENTIFICATION NUMBER (VIN) SALSK25428A146957**

I, Jason J. Soule, being first duly sworn on oath, do hereby depose and say:

1. I am employed as a Special Agent with the Federal Bureau of Investigation in Milwaukee, Wisconsin, currently assigned to the Milwaukee High Intensity Drug Trafficking Area (“HIDTA”) – Drug/Gang Task Force, and have been so employed since 2008. During this time, I have investigated violations of controlled substances laws (Title 21 U.S.C. §§ 841(a)(1), 843(b), and 846) and other related offenses. I have received formal training and have participated in numerous complex narcotics trafficking investigations, including complex conspiracies. All the information contained in this affidavit is either the result of personal observation and investigation, or has been relayed to me by other members of the law enforcement community or citizen witnesses, all of whom I believe to be truthful and reliable.

2. I submit this affidavit in support of a Verified Complaint for Civil Forfeiture *in rem* against the defendant property, one 2008 Land Rover Range Rover Sport HSE bearing vehicle identification number (VIN) SALSK25428A146957 seized from Robert Woods at 8XX E. Auer Street in Milwaukee, Wisconsin, on or about July 11, 2012. Based upon information I believe to be truthful and reliable, I submit that the defendant property was purchased with proceeds traceable to an exchange of money for a controlled substance, in violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801, *et seq.*

**Background**

3. During the course of their investigations, HIDTA agents received information from various confidential informants (“CIs”) that Robert Woods was a multi-kilogram cocaine

supplier in Milwaukee. The information obtained from the CIs includes, but is not limited to, the following:

- A. CI-1 told agents in January 2008 that Woods purchased five to ten kilograms of cocaine at one time from one of his suppliers. Woods was the primary supplier to the East Side Gangsters (“ESG”). Woods routinely sold cocaine in quantities from 4.5 to 9 ounces at one time.
- B. CI-2 told agents in May 2008 that Woods was a gang member and distributed cocaine in Milwaukee.
- C. CI-3 told agents in September 2009 that Woods was a large-scale cocaine supplier to numerous dealers on the east side of Milwaukee.
- D. CI-4 told agents in November 2009 that Woods was selling large amounts of cocaine. Woods purchased three to four kilograms of cocaine at one time and then sold the cocaine in at least 4.5-ounce quantities. Woods had a lot of expensive jewelry and several expensive cars.
- E. CI-5 told agents in December 2009 that CI-5 had purchased approximately 4.5 ounces of cocaine about once per month for \$2,750 from Woods in late 2006. By early 2007, CI-5 had purchased one kilogram of cocaine from Woods about once per month for \$22,000. By mid-2007, CI-5 had purchased between one and four kilograms of cocaine from Woods one to two times per month until January 2008, when CI-5 stopped selling cocaine. Woods spent large amounts of money on jewelry and cars.
- F. CI-6 told agents in December 2009 that many of Woods’ assets, such as cars and real property, may have been put in the name of his girlfriend, LaShawna Tolliver, or his girlfriend’s mother, L.T.
- G. CI-7 told agents in January 2010 that CI-6 had purchased up to nine ounces of cocaine at one time from Woods up until early 2008, when CI-6 stopped selling cocaine, but Woods continued to sell cocaine. Woods was a member of the ESG and supplied the ESG and other gangs with cocaine.
- H. CI-8 told agents in January 2010 that Woods was a large-scale cocaine dealer in Milwaukee and that Woods was one of the three largest cocaine suppliers on the east side.
- I. CI-9 told agents in June 2010 that Woods was a kilogram-level cocaine dealer in Milwaukee who purchased four to five kilograms at one time.

- J. CI-10 told agents in December 2011 that Woods was a kilogram-level cocaine dealer on the east side of Milwaukee.
- K. CI-11 told agents in February 2012 that CI-11 and Woods sold cocaine as far back as the late 1990s.
- L. CI-12 told agents in April 2012 that on two separate occasions, one month apart, CI-12 had purchased one kilogram of cocaine from Woods for \$35,000 per kilogram.

#### **CONTROLLED BUY ON NOVEMBER 15, 2011**

- 4. On November 15, 2011, CI-5, working under the direction of HIDTA agents, conducted a controlled buy of cocaine from Woods.
- 5. On November 14, 2011, CI-5 met with Woods and told Woods that CI-5 had two individuals who were both looking to purchase 4.5 ounces of cocaine for \$4,000. Woods agreed to supply the cocaine and to call CI-5 when Woods was ready to conduct the transaction.
- 6. On November 15, 2011, CI-5 called Woods and they agreed to meet in the area of 4116 North 51<sup>st</sup> Street in Milwaukee to conduct the transaction.
- 7. At about 12:53 p.m. on November 15, 2011, while conducting surveillance, agents saw Woods pull up in his Lexus and park in front of 4116 North 51<sup>st</sup> Street. CI-5 exited CI-5's vehicle and entered the Lexus. CI-5 told Woods that he could sell only one of the two 4.5-ounce bags of cocaine, but Woods told CI-5 to take both bags of cocaine because Woods did not want to drive around with the cocaine. CI-5 took the two bags totaling nine ounces of cocaine and exited the Lexus at about 12:55 p.m. Woods and CI-5 drove away in the respective vehicles. CI-5 had not yet paid Woods for the cocaine.
- 8. At about 1:06 p.m., CI-5 called Woods and they agreed to meet again at the same location.

9. At about 1:15 p.m., Woods pulled up and parked in front of 4116 North 51<sup>st</sup> Street. After about five minutes, CI-5 arrived, entered Woods' Lexus, and gave Woods \$4,000 in pre-recorded buy money for one of the two bags of cocaine. CI-5 told Woods that CI-5 would pay Woods the other \$4,000 in a few days. CI-5 then exited the Lexus and drove away. Officers followed Woods' Lexus as it also drove off.

10. At about 1:30 p.m., officers conducted a traffic stop on the Lexus in the 3900 block of West Fond du Lac Avenue in Milwaukee. Woods was the only occupant of the vehicle. A check of the Lexus showed that it was registered to L.T., who is the mother of Woods' girlfriend, LaShawna Tolliver. Woods consented to a search of the vehicle, and officers found the \$4,000 buy money in the center console. Woods told officers that he was on his way to purchase a 2002 Infinity from someone who placed an ad on Craig's List and that he made the money from selling CDs of his music for \$3 each and had been saving money for some time. Officers told Woods the money was being seized pending investigation, and Woods replied that he would get the money back like the last time. Woods was then released from the scene.

#### **Indictment on July 10, 2012, and Woods' Arrest on July 11, 2012**

11. On July 10, 2012, the Grand Jury indicted Woods with one count of knowingly and intentionally distributing a mixture and substance containing cocaine on November 15, 2011, in violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C), in Case No. 12-CR-142 (E.D. Wis.). An arrest warrant was then issued. On July 11, 2012, as previously arranged, Woods met with HIDTA agents at the HIDTA office and was arrested.

### **Woods' July 11, 2012 Statement and Relinquishment of Defendant Property**

12. On July 11, 2012, at the time of his arrest, Woods was read his constitutional rights, which Woods stated he understood. Woods stated that he was willing to talk and was ready to cooperate as he had expected this day was coming soon.

13. When agents questioned Woods about the defendant property, a 2008 Land Rover Range Rover Sport HSE, which Woods operated, Woods stated that he had paid \$8,000 for the Range Rover and he admitted that he had obtained the \$8,000 from drug dealing. Woods told agents that he had purchased the vehicle from M.B. from Chicago but had not yet registered the vehicle. Woods admitted that he was going to put the vehicle in his girlfriend's name, LaShawna Tolliver, or her mother's name, L.T. (as he had done with the Lexus).

14. Woods agreed to turn the Range Rover over to agents. He gave agents the keys to the vehicle and told agents that the vehicle was parked at 8XX E. Auer Street in Milwaukee. Agents then located and seized the vehicle from 8XX E. Auer Street.

### **Woods' Plea Agreement on October 26, 2012 and Sentence**

15. On or about October 26, 2012, Woods pleaded guilty to the one-count indictment in Case No. 12-CR-142 (E.D. Wis.) of knowingly and intentionally distributing a mixture and substance containing cocaine on November 15, 2011, in violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C). As part of the plea agreement, Woods agreed to the forfeiture of all items listed in the indictment and agreed that the government reserved the right to proceed against assets not identified in the plea agreement.

16. Woods was sentenced to seven years in prison beginning on or about May 1, 2013, and to three years of supervised release.

**Claim Submitted in the Administrative Forfeiture Action**

17. On or about July 11, 2012, the Federal Bureau of Investigation commenced an administrative forfeiture action against the defendant property, one 2008 Land Rover Range Rover Sport HSE bearing vehicle identification number (VIN) SALSK25428A146957. On or about June 11, 2013, LaShawna Tolliver filed a claim to the defendant property.

**Conclusion**

18. Based on my training and experience and the evidence I have received and the information I have obtained in the course of this investigation to date, I submit that the defendant property, one 2008 Land Rover Range Rover Sport HSE bearing vehicle identification number (VIN) SALSK25428A146957 seized from Robert Woods at 8XX E. Auer Street in Milwaukee, Wisconsin, on or about July 11, 2012, was purchased with proceeds traceable to an exchange of money for a controlled substance, in violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801, *et seq.*, and is therefore subject to forfeiture to the United States of America pursuant to 21 U.S.C. § 881(a)(6).

s/JASON J. SOULE  
JASON J. SOULE

Subscribed and sworn to before me  
this 4<sup>th</sup> day of September, 2013.

s/CATHY L. TRAUTMAN  
Notary Public, State of Wisconsin  
My commission: expires 08/30/15.